

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

Criminal No. 25-mj-3059 (KAR)

JACOB D. MILLER

**GOVERNMENT'S MOTION FOR PRETRIAL DETENTION  
OF DEFENDANT PURSUANT TO 18 U.S.C. §§ 3142(e) and (f)**

The United States of America, by its undersigned attorneys (the "Government") moves for pretrial detention of defendant, pursuant to 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because it involves (check all that apply):

- Crime of violence (18 U.S.C. §§ 3142(f)(1)(A) and 3156)
  - Maximum sentence life imprisonment or death (18 U.S.C. § 3142(f)(1)(B))
  - 10 plus years drug offense (18 U.S.C. § 3142(f)(1)(C))
  - Felony, with two prior convictions in above categories (18 U.S.C. § 3142(f)(1)(D))
- XXX Felony involving possession of firearm / destructive device (18 U.S.C. § 3142(f)(1)(E))
- Serious risk defendant will flee (18 U.S.C. § 3142(f)(2)(A))
- XXX Serious risk of obstruction of justice

2. Reason for Detention. The court should detain defendant because there are no conditions of release which will reasonably assure (check one or both):

- Defendant's appearance as required  
 Safety of any other person and the community

3. Rebuttable Presumption. None.

4. Time for Detention Hearing. The Government requests that the court conduct the detention hearing in three days.

5. Witnesses.

The Government intends to proceed by proffer with the evidence set forth in the Affidavit of FBI Special Agent Dustin Farivar in support of the defendant's Criminal Complaint and in the Affidavit of FBI Special Agent Derek Boucher in support of the instant motion for pretrial detention.

6. Other Matters.

None.

Respectfully submitted,

LEAH B. FOLEY  
United States Attorney  
STEVEN  
BRESLOW

By: /s/ Steven H. Breslow  
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Dated: April 10, 2025

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By: */s/ Steven H. Breslow*  
STEVEN H. BRESLOW  
Assistant U.S. Attorney